

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

Paul R. DeFilippo, Esq.  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
Facsimile: (212) 382-0050  
pdefilippo@wmd-law.com

**JONES DAY**

Gregory M. Gordon, Esq.  
Brad B. Erens, Esq.  
Dan B. Prieto, Esq.  
Amanda Rush, Esq.  
2727 N. Harwood Street  
Dallas, Texas 75201  
Telephone: (214) 220-3939  
Facsimile: (214) 969-5100  
gmgordon@jonesday.com  
bberens@jonesday.com  
dbprieto@jonesday.com  
asrush@jonesday.com  
(Admitted *pro hac vice*)

**ATTORNEYS FOR DEBTOR**

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

**RETENTION QUESTIONNAIRE**

**RETENTION QUESTIONNAIRE TO BE COMPLETED BY EACH ORDINARY  
COURSE PROFESSIONAL EMPLOYED BY THE DEBTOR**

Do not file this Questionnaire with the Court. Please return it to:

Jones Day

Attn: Dan B. Prieto, Esq.

Amanda Rush, Esq.

2727 North Harwood Street, Suite 500, Dallas, Texas 75201

dbprieto@jonesday.com

asrush@jonesday.com

and

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Jones Day  
Attn: Isel M. Perez  
600 Brickell Avenue, Suite 3300, Miami, Florida 33131  
iperez@jonesday.com

If more space is needed, please complete on a separate page and attach.

1. Name and Address of Firm:

CARLTON FIELDS  
CityPlace Tower  
525 Okeechobee Boulevard  
Suite 1200  
West Palm Beach, Florida 33401-6350

2. Date of retention: October 14, 2021

3. Type of services to be provided:

Litigation advice and services related to personal injury claims arising from the alleged use of talc containing products manufactured, distributed, marketed, and/or sold by the Debtor.

4. Brief description of services to be provided:

Monitoring case dockets and assisting with matters related to enforcing the automatic stay and, to the extent necessary and permitted by order of this Court, services would also include preparing for and attending hearings, oral arguments, trials and other court proceedings as may be required, and providing other related litigation services, including preparing required court filings, as the Debtor may require.

The Firm appears on behalf of the Debtor in the following courts:

Circuit Court of Broward County, Florida

5. Arrangements for compensation (hourly, contingent, etc.)

The Firm bills hourly rates for its services (in one-tenth hour increments), and will also seek reimbursement of costs and expenses.

(a) Average hourly rate (if applicable):

Shareholder	\$535
Associate	\$340
Paralegal	\$266

(b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition): \$2,300

6. Prepetition claims against the Debtor held by the firm: \$3,000.24<sup>2</sup>

7. Prepetition claims against the Debtor held individually by any member, associate, or professional employee of the company:

None.

8. Disclose the nature and provide a brief description of any interest adverse to the Debtor or to its estates for the matters on which the firm is to be employed:

The Firm does not have an interest adverse to the Debtor. The Firm does jointly represent Johnson & Johnson in certain personal injury actions arising from the alleged use of talc-containing product.

9. Name and title of individual completing this form:

Ryan Cobbs, Shareholder  
Ashley Drumm, Shareholder

Dated: May 3, 2022

---

<sup>2</sup> As of the Petition Date, \$146,440.55 was owed for work performed on behalf of Johnson & Johnson and the Debtor's predecessor, Johnson & Johnson Consumer, Inc., with respect to claims asserted against Johnson & Johnson and Johnson & Johnson Consumer, Inc. and now the Debtor, arising from the alleged use of certain talc-containing products. Johnson & Johnson satisfied \$143,440.31 following the Petition Date consistent with Johnson & Johnson's engagement with the Firm. The Firm has billed the remaining \$3,000.24 to Johnson & Johnson, consistent with the terms of its engagement with Johnson & Johnson.